

# **EXHIBIT D**

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1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE WESTERN DISTRICT OF WASHINGTON

3  
4 AT SEATTLE  
5  
6  
7

8 MICROSOFT CORPORATION, a )  
9 Washington corporation, )  
10 )  
11 Plaintiff, )  
12 ) No. 2-10-cv-  
13 vs. ) 01823-JLR  
14 )  
15 MOTOROLA, INC., and MOTOROLA )  
16 MOBILITY, INC., )  
17 )  
18 Defendants. )  
19  
20  
21 VIDEOTAPED 30 (b) (6) DEPOSITION OF  
22  
23 May 9, 2013  
24 Job No. CS1663256  
25 Seattle, Washington

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1 MS. ROBERTS: Andrea Pallios

2 Roberts of Quinn Emanuel, representing defendant  
3 Motorola.

4 MS. MANGIN: Elanor Mangin of Quinn  
5 Emanuel, representing Motorola.

6 MR. WION: Chris Wion from Calfo  
7 Harrigan, representing Microsoft and the witness.

8 THE VIDEOGRAPHER: Thank you.

9 At this time, we'd ask the court reporter, Karmen  
10 Knudson of Veritext, to please swear in the witness  
11 and proceed with the deposition.

12 JAMES JEFF DAVIDSON, having been first duly sworn  
13 by the Notary, deposed and  
14 testified as follows:

15

16

17 EXAMINATION

18 BY MS. ROBERTS:

19 Q Good morning, Mr. Davidson.

20 A Good morning.

21 Q As you heard, my name is Andrea Roberts and I'm going  
22 to be taking your deposition taken today.

23 Have you ever been deposed before?

24 A Never.

25 Q Okay. Well, I'm going to go over some of the ground

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EXAMINATION (Continuing)

2

BY MS. ROBERTS:

3

Q Mr. Davidson, I'd like to kind of get a sense of  
the timeline of the move from the Düren, Germany  
facilities to -- to Venray.

6

7

So, first of all, when did Microsoft decide to  
relocate the EMEA facilities?

8

9

10

11

A It was that first week of March where -- when we  
decided to do it. But -- somewhere in there. It was  
early March. Somewhere -- I mentioned March 8th  
earlier. I know that was an award date.

12

13

14

I think -- it was right within that same time  
period. It was just a -- a flurry of decisions and  
activity.

15

Q And when you say "March," you mean March 2012; right?

16

A Yes, March of 2012. Sorry.

17

18

Q When did Microsoft start considering whether it  
should move the EMEA facilities?

19

A Mid-January of 2012.

20

21

Q And who -- who ultimately made the decision to move  
the facilities?

22

23

A It would have been me; Owen Roberts, my boss; and his  
boss, Brian Tobey.

24

Q Brian Tobey?

25

A Yes.